

UNITED STATES DISTRICT COURT  
for the  
Southern District of Texas

United States of America )  
v. ) Case No. 7:23-mj-1071  
Javier Arturo PEREZ-Lara )  
YOB: 1981 COB: Mexico )  
Defendant(s) )  
United States District Court  
Southern District of Texas  
FILED  
JUN 12 2023

**CRIMINAL COMPLAINT** *Nathan Ochsner, Clerk*

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.  
On or about the date(s) of June 11, 2023 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841	Knowingly and intentionally possessed with intent to distribute more than 5 kilograms of cocaine, approximately 10.52 kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Attachment A

Continued on the attached sheet.

Approved by AUSA Cahal McColgan

/s/ Rafael Garza Jr

*Rafael Garza Jr*  
Complainant's signature

Sworn to and executed by reliable electronic means, and attested telephonically per Fed. R. Cr. 4.1, and probable cause found on:

Date: 6/12/23 at 7:27am

Rafael Garza Jr HSI Special Agent

*Rafael Garza Jr*  
Printed name and title



Judge's signature

City and state: McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge

*Juan F. Alanis*  
Printed name and title

**ATTACHMENT A**

On June 11, 2023, United States Customs and Border Protection (CBP) requested assistance from the Department of Homeland Security Investigations (HSI) from the office of Resident Agent in Charge, Falcon Heights, Texas regarding a narcotics smuggling attempt. HSI Special Agent (SA) Rafael Garza Jr responded to the Roma, Texas Port of Entry (POE).

Customs and Border Protection Officers (CBPOs) reported that on June 11, 2023, at approximately 12:35 p.m. Javier Arturo PEREZ-Lara, a Mexican national with a border crossing card, was seeking entry into the United States in a passenger vehicle. PEREZ-Lara was the sole occupant of the vehicle. CBPOs took a negative declaration from PEREZ-Lara. CBPO's referred PEREZ-Lara for a secondary inspection.

While at secondary, CBPO's proceeded to do an inspection on PEREZ-Lara's vehicle. CBPOs opened the hood of the vehicle and discovered packages between the radiator and grill of PEREZ-Lara's vehicle. The vehicle was then referred for a Z Portal scan revealing anomalies in the radiator area of the vehicle.

A total of nine (9) packages were discovered and extracted from the radiator area. The packages contained a white powdery substance and field tested positive for the properties of cocaine. The packages had a total weight of approximately 10.52 kilograms.

I, HSI SA Rafael Garza Jr interviewed PEREZ-Lara. PEREZ-Lara stated he was the owner of the vehicle and stated he had purchased the vehicle approximately two years ago. PEREZ-Lara confessed he knew he was smuggling narcotics from Mexico to the United States for personal monetary gain. PEREZ-Lara admitted to smuggling in the packages from Mexico so that they could be given to someone else in the United States. PEREZ-Lara also confessed to smuggling narcotics on four prior occasions before this time.